Case 2:22-mj-30259-DUTY ECF No. 1 Page D 1 Filed 06/07/22 Page 1 of 6 No. 1 Page D 1 Filed 06/07/22 Page 1 of 6 (313) 226-9103

AO 91 (Rev. 11/11) Criminal Complaint

Sworn to before me and signed in my presence

and/or by reliable electronic means.

City and state: Detroit, Michigan

June 7, 2022

Special Agent:

Nathan Triezenberg (ATF)

Telephone: (313) 202-3400

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America v. RAYMOND WOODS JR.			Case: 2:22-mj-30259 Assigned To: Unassigned Assign. Date: 6/7/2022 Description: RE: RAYMOND WOODS JR. (EOB)		
		Case No.			
	CRIMINAL COM				
I, the complainant in this case, state that	_				• 4
On or about the date(s) of				Wayne	in the
Code Section	Offense Description				
18 U.S.C. § 922(g)(1)	sion of a Firea	-			
This criminal complaint is based on the SEE ATTACHED AFFIDAVIT	ese facts:				
Continued on the attached sheet.			M		
			Complainant's		
		Spe	cial Agent Nathan T Printed name of		

Judge's signature

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

- I, Nathan Triezenberg, being first duly sworn, hereby state:
- 1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since September 2015. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs.
- 2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. ATF is currently conducting a criminal investigation concerning RAYMOND WOODS JR. (B/M; DOB: XX/XX/1987) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

PROBABLE CAUSE

- 4. I reviewed a computerized criminal history and Michigan Third and Sixteenth Circuit Court records for WOODS, which revealed the following felony convictions.
 - a. On March 4, 2008, WOODS pleaded guilty in Wayne County Third Circuit Court to one count of Felony Controlled Substance – Deliver or Manufacture Cocaine or Other Narcotic Less than 50 Grams – Attempt. WOODS was originally sentenced to HYTA Probation. But WOODS violated probation and the court revoked WOODS's HYTA status and resentenced him to 30 days in the Wayne County Jail on September 15, 2008.
 - b. On October 6, 2008, WOODS pleaded guilty in Macomb County
 Sixteenth Circuit Court to Felony Controlled Substance Possession of Cocaine or Other Narcotic Less than 25 Grams. On January 22, 2009, WOODS was sentenced two years of probation. WOODS
 violated probation and the court resentenced him to 270 days in the Macomb County Jail on January 15, 2013.

- c. On April 28, 2010, WOODS pleaded guilty in Wayne County Third

 Circuit Court to one count of Felony Controlled Substance Deliver

 or Manufacture Marijuana. WOODS failed to appear at his original
 sentencing date. He was sentenced to two years of probation on

 August 18, 2010. WOODS violated probation and the court
 resentenced on November 7, 2011.
- d. On November 14, 2011, WOODS pleaded guilty in Wayne County Third Circuit Court to one count of Felony Receiving and Concealing Stolen Property – Motor Vehicle. WOODS was sentenced to three months in the Wayne County Jail, followed by a two-year term of probation on December 6, 2011. WOODS violated probation twice and was resentenced to six months in the Wayne County Jail on May 28, 2013.
- 5. On June 6, 2022 at approximately 2:22 am, two Detroit Police
 Officers working patrol in Detroit's Ninth Precinct observed a 2014 silver
 Chevrolet Malibu disregard a traffic control device near the intersection of East 8
 Mile and Hickory in the city of Detroit, MI. The officers conducted a traffic stop of the vehicle in the area of E. 8 Mile and Hickory for the traffic violation.
- 6. The driver, WOODS, provided officers with a Michigan driver's license and identified himself. While one of the officers was taking WOODS's

information, the officer standing on the passenger side of WOODS's vehicle looked down on the floorboard of the rear of the vehicle and observed a black handgun. The officer notified her partner about the presence of the gun and the partner asked WOODS to step out of the vehicle.

- 7. After WOODS exited the vehicle, officers recovered the firearm—a Glock, Model 23 handgun, SN: GDB008—from the rear passenger floorboard. Officers asked WOODS if he possessed a CPL, to which he replied in the negative. WOODS further stated there was a second firearm in the vehicle. Officers then recovered a second Glock, Model 23 handgun, SN: TLW571 from in between the driver's seat and center console. WOODS was arrested for carrying a concealed weapon and was transported to the Detroit Detention Center.
- 8. The Glock Model 23 handgun, SN: TLW571—recovered from in between the driver's seat and center console of WOODS's vehicle—was reported stolen in Detroit on September 2, 2015.
- 9. Your affiant is trained and is recognized as an authority on interstate nexus. Affiant has reviewed the information and description for both of the firearms seized in this case. Based on the provided information, both Glock Model 23 firearms were manufactured outside of the state of Michigan and have thus travelled in or effected interstate or foreign commerce.

CONCLUSION

10. Based upon the aforementioned facts stated herein, there is probable cause to believe RAYMOND WOODS JR. (B/M; DOB: XX/XX/1987), a convicted felon aware of his felony conviction, did knowingly and intentionally possess two Glock 23 Model handguns, said firearms having affected interstate commerce, in violation of 18 U.S.C. 922(g)(1) (Felon in Possession of a Firearm). Said violations occurring on or about June 6, 2022, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,

Nathan D. Triezenberg ATF Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. David Grand

United States Magistrate Judge

Dated: June 7, 2022